

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a PORNHUB.COM,
MG FREESITES II LTD., MINDGEEK
S.A.R.L., MINDGEEK USA, INC., MG
BILLING LTD., and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**MOTION TO EXCEED PAGE
LIMITATION OF WISEBITS IP, LTD'S
REPLY TO PLAINTIFFS' RESPONSE IN
OPPOSITION TO MOTION TO DISMISS**

The undersigned counsel files this Motion to Exceed Page Limitation with respect to Wisebits IP, LTD's reply to Plaintiffs' Response in Opposition to its Motion to Dismiss, and would respectfully show the Court the following:

1. Local Rule 7.05(B)(2) of the District Court for the District of South Carolina states that reply briefs are limited to fifteen pages. Because Wisebits IP, LTD's reply to Plaintiffs' response is longer than fifteen pages, Wisebits IP, LTD requests leave of Court to exceed the page limitation.

2. Good cause exists for extending the page limitation. Wisebits IP, LTD filed a motion to dismiss the Plaintiff's complaint for lack of jurisdiction and for failure to state a claim, ECF#247, on December 23, 2022. Plaintiffs filed their response to Wisebits IP, LTD's motion to dismiss on February 20, 2023, ECF#277.

3. The facts and arguments raised in Wisebits IP, LTD's motion to dismiss and Plaintiffs' response thereto are complicated and involve multiple entities. The Plaintiffs response to the motion to dismiss exceeded the number of pages allowed by Local Rule 7.05(B)(1).

4. Due to the multitude of issues, the number of parties, and the length of Plaintiff's response, it is impossible for Wisebits IP, LTD to avoid exceeding the page limitation. Moreover, while Defendant's memorandum may exceed the page limitation allowed under the rules, the length of Defendant's single memorandum to be filed is necessitated by the fact that it is submitted in reply to the respective motions to dismiss and responses thereto for three Defendants: Trafficstars, LTD, Wisebits, LTD, and Wisebits IP, LTD.

5. Plaintiff consents to Defendant Wisebits IP, LTD's motion to exceed the page limitation.

For the foregoing reasons, Wisebits IP, LTD respectfully requests the Court grant it leave to exceed the page limitation for Wisebits IP, LTD's Reply to Plaintiff's Response in Opposition to Defendant Wisebits IP, LTD's Motions to Dismiss.

Respectfully requested,

s/ Hannah Rogers Metcalfe

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March 10, 2023
Greenville, South Carolina